

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 24-cv-22751-BLOOM/Elfenbein

DAS NOBEL, EDUARDO MARTINEZ,
DANIEL GRANDE, WILLIAM POU, AND
DAVID ZIEMEK on behalf of themselves, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SOUTH FLORIDA STADIUM LLC d/b/a Hard
Rock Stadium, CONFEDERACION
SUDAMERICANA DE FUTBOL, d/b/a
CONMEBOL, CONFEDERATION OF NORTH,
CENTRAL AMERICA AND CARIBBEAN
ASSOCIATION FOOTBALL d/b/a CONCACAF,
BEST CROWD MANAGEMENT, INC., MIAMI
DOLPHINS, LTD; COUNTY LINE SOUTH
PROPERTIES, LLC; DOLPHIN CENTER
PROPERTIES, LLC;

Defendants.

JOINT STATUS REPORT

Plaintiffs Das Nobel, Eduardo Martinez, Daniel Grande, William Pou, and David Ziemek (“Plaintiffs”) and Defendants South Florida Stadium LLC (“SFS”), Miami Dolphins, Ltd. (the “Miami Dolphins”), County Line South Properties, LLC (“CLS Properties”), Dolphin Center Properties, LLC (“DC Properties”), Confederacion Sudamericana de Futbol (“CONMEBOL”), Confederation of North, Central America and Caribbean Association Football (“CONCACAF”), and BEST Crowd Management, Inc. (“BEST,” and collectively with SFS, Miami Dolphins, CLS

Properties, DC Properties, CONMEBOL, and CONCACAF, “Defendants” and collectively with Plaintiffs, the “Parties”), submit this joint status report.

On January 16, 2025, the Court granted the Parties’ Joint Motion for a Stay of All Deadlines while the Parties participated in a mediation and directed the Parties to submit a status report following the mediation scheduled for March 28, 2025. [Dkt. 153.]

On March 28, 2025, the Parties participated in an in-person mediation before Terrence M. White of Upchurch Watson White and Max Mediation Group.¹ The mediation was productive, and the Parties are now discussing a class settlement that if finalized and approved by the Court would resolve this case in its entirety, along with a class action that raises similar issues, viz. Garn v. SFS, et al., Case No. 1:24-cv-25087-Williams/Goodman (S.D. Fla.). The mediation did not conclude during the March 28, 2025 session, however, and was continued with the consent of the Parties. To that end, the Parties are continuing to work together and have scheduled an additional mediation, to occur by Zoom with the same mediator on May 13, 2025. The Parties, therefore, respectfully request that the Court stay this Action for an additional sixty (60) days.

WHEREFORE, the undersigned respectfully request that the Court extend the current stay entered in this Action for an additional sixty (60) days so that the parties may continue to mediate.

¹ While the majority of the Parties and their counsel participated in person, some of the named plaintiffs participated by Zoom.

Date: April 4, 2025

VARNELL & WARWICK, P.A.

/s/ Jeffrey L. Newsome

Jeffrey L. Newsome; FBN: 1018667
Janet R. Varnell; FBN: 0071072
Brian W. Warwick; FBN: 0605573
Pamela G. Levinson; FBN: 538345
Christopher J. Brochu; FBN: 1013897
400 N Ashley Drive, Suite 1900
Tampa, Florida 33602
Telephone: (352) 753-8600
jnewsome@vandwlaw.com
jvarnell@vandwlaw.com
bwarwick@vandwlaw.com
plevinson@vandwlaw.com
cbrochu@vandwlaw.com
ckoerner@vandwlaw.com

AYALA LAW, P.A.

/s/ Eduardo A. Maura

Eduardo A. Maura; FBN: 91303
Luis F. Quesada Machado; FBN: 1010305
Ryan M. Sawal; FBN: 1038500
Orestes D. Garcia; FBN: 1049046
2490 Coral Way, Ste 401
Miami, Florida 33145
Telephone: (305) 570-2208
Email: eduardo@ayalalawpa.com
Email: lquesada@ayalalawpa.com
Email: rsawal@ayalalawpa.com
Email: orestes@ayalalawpa.com

Respectfully submitted,

**BILZIN SUMBERG BAENA PRICE
& AXELROD LLP**

/s/ Melissa C. Pallett-Vasquez

Melissa C. Pallett-Vasquez
Fla. Bar No.: 0715816
Matthew W. Tieman
Fla. Bar No.: 1044909
1450 Brickell Avenue, Suite 2300
Miami, Florida 33131-3456
Telephone: (305) 350-2393
Facsimile: (305) 374-7593
Email: mpallett@bilzin.com
Email: mtieman@bilzin.com
Email: eservice@bilzin.com

LATHAM & WATKINS LLP

Mark Mester (*pro hac vice* ECF No. 24)
Johanna Spellman (*pro hac vice* ECF No. 25)
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Email: mark.mester@lw.com
Email: johanna.spellman@lw.com

***Counsel for Defendants South Florida Stadium
LLC, Miami Dolphins, Ltd., County Line South
Properties, LLC, and Dolphin Center Properties,
LLC***

HIRALDO P.A.

/s/ Manuel S. Hiraldo

Manuel S. Hiraldo; FBN: 030380
401 E. Las Olas Boulevard, Suite 1400
Ft. Lauderdale, Florida 33301
Telephone: (954) 400-4713
Email: mhiraldo@hirdolaw.com

MOORE LAW, PLLC

/s/ Fletcher Moore

Fletcher Moore (admitted *pro hac vice*)
30 Wall Street, 8th Floor
New York, New York 10005
Telephone: (212) 709-8245
fletcher@fmoorelaw.com

SQUITIERI & FEARON LLP

/s/ Lee Squitieri

Lee Squitieri (admitted *pro hac vice*)
305 Broadway, 7th Floor
New York, New York 10007
Telephone: (212) 421-6492
Email: lee@sfclasslaw.com

Counsel for Plaintiffs

BAKER & HOSTETLER LLP

/s/ Julie Singer Brady

Julie Singer Brady, Esq.
Florida Bar No. 389315
Brandon T. Crossland, Esq.
Florida Bar No. 21542
Meghan V. Kennedy, Esq.
Florida Bar No. 1038634
200 South Orange Avenue, Suite 2300
Orlando, Florida 32801
Telephone (407) 649-4000
Facsimile (407) 841-0168
Email: jsingerbrady@bakerlaw.com
Email: brcrossland@bakerlaw.com
Email: mkennedy@bakerlaw.com
Email: mrios@bakerlaw.com
Email: orlbakerdocket@bakerlaw.com
Email: smccoy@bakerlaw.com
Email: fapodaca@bakerlaw.com

Attorneys for Confederacion Sudamericana de Futbol, d/b/a CONMEBOL

SIDLEY AUSTIN LLP

/s/ Lawrence D. Silverman

Lawrence D. Silverman
Connor T. Evans
1001 Brickell Bay Drive, Suite 900
Miami, Florida 33131
Telephone: (305) 391-5100
Facsimile: (305) 391-5101z
Email: lawrence.silverman@sidley.com
Email: connor.evans@sidley.com

John J. Kuster (admitted *pro hac vice*)
Jon Muenz (*pro hac vice* pending)
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: jkuster@sidley.com
Email: jmuenz@sidley.com

***Counsel for Defendant Confederation of North,
Central America and Caribbean Association
Football***

BRYAN CAVE LEIGHTON PAISNER LLP

/s/ C. Ryan Reetz

C. Ryan Reetz (Fla. Bar No. 934062)
Pedro J. Martinez-Fraga (Fla. Bar No. 752282)
200 South Biscayne Blvd., Suite 400
Miami, Florida 33131
Telephone: (786) 322-7500
Facsimile: (786) 322-7501
Email: ryan.reetz@bclplaw.com
Email: pedro.martinezfraga@bclplaw.com

Brian A. Sher (admitted *pro hac vice*)
Lauren J. Caisman (admitted *pro hac vice*)
BRYAN CAVE LEIGHTON PAISNER LLP
161 North Clark Street, Suite 3400
Chicago, IL 60601
Telephone: (312) 602-5000
Facsimile: (312) 602-5050
Email: brian.sher@bclplaw.com
Email: lauren.caisman@bclplaw.com

Counsel for BEST Crowd Management, Inc.